

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

MAGTEN ASSET MANAGEMENT CORPORATION
and LAW DEBENTURE TRUST COMPANY OF NEW
YORK,

Plaintiffs,

v.

NORTHWESTERN CORPORATION,

Defendant.

C.A. No. 04-1494-JJF

MAGTEN ASSET MANAGEMENT CORPORATION,

Plaintiff,

v.

MIKE J. HANSON & ERNIE J. KINDT,

Defendants.

C.A. No. 05-0499-JJF

REQUEST FOR ORAL ARGUMENT AND NOTICE OF COMPLETION OF BRIEFING

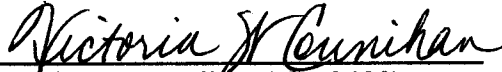
In accordance with this Court's procedures and Local Rules 7.1.2 and 7.1.4, NorthWestern Corporation ("NorthWestern"), by and through its counsel, Greenberg Traurig, LLP and Curtis, Mallet-Prevost, Colt & Mosle LLP, hereby notifies the Court that briefing on NorthWestern's Emergency Cross Motion for an Order Truncating the Normal Briefing Schedule Under Local Rule 7.1.2 and Setting an Immediate Telephonic Hearing and for an Order that Plaintiffs and Their Counsel Immediately Comply with Their Obligations Pursuant to Paragraph 8 of the Stipulated Protective Order of March 21, 2007 (the "Motion") [Docket No. 145] is complete.

On April 16, 2007, NorthWestern filed the Motion together with its Memorandum in Support of Motion [Docket No. 146] and Affidavit of Joseph D. Pizzurro, Esq. in Support of the Motion [Docket No. 147]. On April 18, 2007, Magten Asset Management Corporation and Law Debenture Trust Company of New York filed their Joint Answering Brief to NorthWestern Motion [Docket No. 150]. On April 25, 2007, NorthWestern filed its Reply Memorandum [Docket No. 162] and Affidavit of Joseph D. Pizzurro, Esq. in Support of the Reply Memorandum [Docket No. 163]. Accordingly, all briefing related to the Motion has been completed.

Pursuant to Local Rule 7.1.4, NorthWestern hereby requests that oral argument be held on the Motion at the Court's earliest convenience.

Dated: April 30, 2007

GREENBERG TRAURIG LLP


Victoria W. Counihan (No. 3488)
Dennis A. Meloro (No. 4435)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, DE 19801
(302) 661-7000

and

**CURTIS, MALLET-PREVOST, COLT &
MOSLE LLP**

Joseph D. Pizzurro
Steven J. Reisman
Nancy E. Delaney
101 Park Avenue
New York, NY 10178
(212) 696-6000
Facsimile: (212) 697-1559

Attorneys for NorthWestern Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**MAGTEN ASSET MANAGEMENT
CORPORATION and LAW DEBENTURE
TRUST COMPANY OF NEW YORK,**

Plaintiffs,

V.

C.A. No. 04-1494 (JJF)

NORTHWESTERN CORPORATION,

Defendant.

MAGTEN ASSET MANAGEMENT CORP.,

Plaintiff,

V.

C.A. No. 05-499 (JJF)

MIKE J. HANSON and ERNIE J. KINDT,

Defendants.

CERTIFICATE OF SERVICE

I, Victoria W. Counihan, being duly sworn according to law, deposes and says that I am employed by Greenberg Traurig, LLP, which is counsel for the NorthWestern Corporation, and that on the 30th of April 2007, I caused to be served copies of the REQUEST FOR ORAL ARGUMENT AND NOTICE OF COMPLETION OF BRIEFING upon the parties listed below via Electronic Mail, Hand Delivery upon Local Counsel and via First Class, United States Mail upon the remaining parties.

| | |
|--|---|
| <p>Dale Dube, Esq. David Carickhoff, Esq. Blank Rome LLP 1201 Market Street, Suite 800 Wilmington DE 19801 (Magten)</p> | <p>Bonnie Steingart, Esq. Gary L. Kaplan, Esq. Fried Frank Harris Shriver & Jacobson LLP One New York Plaza New York NY 10004 (Magten)</p> |
| <p>Kathleen M. Miller, Esquire Smith Katzenstein & Furlow LLP 800 Delaware Avenue, 7th Floor Wilmington, DE 19801</p> | <p>John V. Snellings, Esq. Amanda Darwin, Esq. Nixon & Peabody LLP 100 Summer Street</p> |

| | |
|--|---|
| (Law Debenture) | Boston, Massachusetts 02100 (Law Debenture) |
| Neil Glassman, Esq. Charlene Davis, Esq. Eric Suttly, Esq. The Bayard Firm 222 Delaware Avenue, Suite 900 Wilmington DE 19801 (NW Plan Committee) | Alan Kornberg, Esq. Margaret Phillips, Esq. Ephraim Diamond, Esq. Paul Weiss Rifkind Wharton & Garrison LLP 1285 Avenue of the Americas New York NY 10019 (NW Plan Committee) |
| Stanley T. Kaleczyc Kimberly A. Beatty Browning, Kaleczyc, Berry & Hoven, P.C. 139 North Last Chance Gulch P.O. Box 1697 Helena, Mt 59624 (M Hanson/E Kindt) | Denise Seastone Kraft Edwards Angell Palmer & Dodge LLP 919 North Market Street, 15th Floor Wilmington, DE 19801 (M Hanson/E Kindt) |

Date: April 30, 2007

GREENBERG TRAURIG, LLP



Victoria W. Counihan (No. 3488)

The Nemours Building

1007 North Orange Street, Suite 1200

Wilmington, DE 19801

Telephone: 302-661-7000